

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Crystal Long

Plaintiff,

v.

Pendrick Capital Partners II, LLC, et al.

Defendants.

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Case No.: 8:17-cv-01955-GJH

Jury Trial Demanded

**CONSENT MOTION TO EXTEND DISCOVERY DEADLINE AND SUBSEQUENT
DEADLINES ON THE SCHEDULING ORDER BY 45 DAYS**

Plaintiff, Crystal Long, by and through undersigned counsel, with the consent of all defendants, hereby respectfully moves the Court for an order extending the deadlines on the Scheduling Order in the following manner:

1. Extend the January 8, 2018 Discovery Deadline by 45 days to Wednesday, February 22, 2018;
2. Extend the January 8, 2018 submission of status report deadline by 45 days to Wednesday, February 22, 2018;
3. Extend the January 16, 2018 Request for admission deadline by 45 days to March 2, 2018; and
4. Extend the February 6, 2018 Dispositive pretrial motions deadline by 45 days to March 23, 2018.

Parties request this extension in an effort to fully resolve pending discovery disputes and delays, and to allow time to schedule and take depositions.

Respectfully Submitted:

/s/ Ingmar Goldson

Ingmar Goldson, Esq.

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Attorney for Plaintiff

Certificate of Service

I hereby certify that on 14th day of December, 2017, a copy of the foregoing Request for Extension of Time was filed electronically via CM/ECF causing it to be served to all counsel of record in this matter.

/s/ Ingmar Goldson

Ingmar Goldson, Esq.

Attorney for Plaintiff